

Tamara Preiss
Vice President
Federal Regulatory Affairs



April 27, 2015

1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2540
Fax 202 336-7922
tamara.preiss@verizon.com

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless. EB Docket No. 14-212,
File No. EB-13-MD-006**

Dear Ms. Dortch:

Attached is Verizon's response to certain of NTCH's Interrogatories in the above-captioned proceeding.¹ Specifically, Verizon is responding to NTCH Interrogatory Number 1, as modified by agreement of the parties,² and Interrogatory Number 5, as modified by the Enforcement Bureau's April 2, 2015 letter.³ As discussed at the March 24, 2015 status conference with Commission staff, Verizon disputes that the all of the information provided is relevant to the ongoing dispute with NTCH and requests that the probative value of this information be fully briefed at a later date in this proceeding.

Verizon has determined that certain information contained in the attached should be treated as Highly Confidential. At this time, Verizon is filing both highly confidential and public versions of the requested information with the Commission. Verizon is providing counsel to NTCH with the public version. Once a Protective Order is adopted by the Commission in this proceeding, Verizon will provide NTCH with access to the highly confidential information, as appropriate.

¹ See Letter from Rosemary McEnery, Deputy Chief, Market Disputes Resolution Division, Enforcement Bureau, FCC, to Donald J. Evans, Fletcher, Heald & Hildreth, P.L.C., and Andre J. Lachance, Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006 (Apr. 2, 2015) ("EB Apr. 2, 2015 Letter").

² Letter to Marlene H. Dortch, FCC, from Donald J. Evans, Counsel to NTCH, and Andre J. Lachance, Counsel for Verizon, at 1 (filed Sept. 30, 2014); EB Apr. 2, 2015 Letter at 2.

³ EB Apr. 2, 2015 Letter at 3.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Speer". The signature is written in a cursive, flowing style with a large initial "J" and a distinct "L" and "S".

cc. Christopher Killion, Chief, MDRD/EB
Rosemary McEnery, Deputy Chief, MDRD/EB
Lisa Boehley, MDRD/EB

VERIZON'S RESPONSE TO NTCH'S INTERROGATORIES

1. Produce a chart reflecting the per unit rates paid to Verizon and by Verizon in each of its existing roaming agreements for all Service Categories (i.e., voice, toll, SMS, and data services), a statement as to whether Verizon is a net payer or net receiver under each agreement, and volume figures reflecting total minutes of voice roaming under each agreement. The chart will not identify Verizon's roaming partners by name.
(Interrogatory 1)

RESPONSE: See attached Exhibit A.

2. With respect to LTE roaming rates associated with Verizon's LTE in Rural America ("LRA") agreements, produce a chart showing: [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[END HIGHLY CONFIDENTIAL INFORMATION] The LRA roaming rate chart will not identify the LRA partner by name and will not include [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]
[REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION]
(Interrogatory 1)

RESPONSE: See attached Exhibit B.

3. Produce Verizon's lowest wholesale (including MVNO) rates provided for each Service Category (i.e., voice, toll, SMS, and data services). (Interrogatory 5 as modified by the Enforcement Bureau's April 2, 2015 letter)

RESPONSE: Verizon's lowest wholesale rates are available only to resellers willing and able to meet [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]
[REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION] Among other things, these rates are conditioned on a reseller: (1) making a [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]
[END HIGHLY CONFIDENTIAL INFORMATION] (2) paying [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]

¹ [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]
[END HIGHLY CONFIDENTIAL INFORMATION] and (3) [BEGIN HIGHLY
CONFIDENTIAL INFORMATION] [REDACTED]
[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL
INFORMATION] Under these conditions, the lowest rates are as follows:

Voice/Toll rate: [BEGIN HIGHLY CONFIDENTIAL
INFORMATION] [REDACTED] [END HIGHLY CONFIDENTIAL
INFORMATION]

SMS rate: [BEGIN HIGHLY CONFIDENTIAL
INFORMATION] [REDACTED] [END HIGHLY CONFIDENTIAL
INFORMATION]

MMS (multi-media message) rate: [BEGIN HIGHLY CONFIDENTIAL
INFORMATION] [REDACTED] [END HIGHLY CONFIDENTIAL
INFORMATION]

Data bundles, one of which must be selected: [BEGIN HIGHLY
CONFIDENTIAL INFORMATION] [REDACTED]
[REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION]

Data overage rate: [BEGIN HIGHLY CONFIDENTIAL
INFORMATION] [REDACTED] [END HIGHLY CONFIDENTIAL
INFORMATION]

4. Produce the lowest retail rate Verizon provides for each Service Category (*i.e.*, voice, toll, SMS, and data services). (Interrogatory 5 as modified by the Enforcement Bureau's April 2, 2015 letter)

RESPONSE: The "lowest" rates available to new retail customers in each Service Category are set forth below. Note that the lowest rate in any particular service category is not meaningful in isolation because these rates are not offered to any retail customers on a standalone basis independent of other terms and conditions of service. Rather, these rates are one part of total revenue (from all sources) Verizon expects to receive from a customer set and may also reflect other factors such as marketing inducements and other business decisions. For example, to receive these rates, customers must pay daily or monthly access charges regardless of usage (except prepaid daily plans where the first usage of the day triggers the access charge), agree to rates for other service categories, and must meet certain conditions, which are set forth below. The Service Category rates, other pricing elements, and conditions for service collectively make up the "Rate Plan" for each customer set.

Where the lowest service category price is available in multiple Rate Plans, Verizon is providing information for the Rate Plan with the lowest per-day or per-month access charge for different customer sets (e.g., prepaid, postpaid, data-only).

The amount a customer pays to Verizon depends on the plan the customer chooses and the amount of actual usage of all service categories under the plan. In other words, the plan with the lowest per-service category rate may not result in the lowest monthly charge to the customer.

A. Voice and toll. Verizon's retail rate plans do not have separate service categories for "voice" and "toll." Voice rates include toll services. One way to analyze the "lowest" voice and toll rate is to identify those service plans that include an unlimited voice allowance for the lowest access charge. Set forth below are the Rate Plans with the lowest per-day or per-month access charge, for those plans with unlimited voice/toll allowance, for different customer types.

- Rate Plan: Prepaid Basic Device \$1.99 Unlimited Talk Daily Plan
Available to: Basic devices only
Prepaid daily access charge: \$1.99 (paid *each day* any service is used regardless of actual usage)
Voice/Toll rate: unlimited
SMS rate: \$0.02/message
MMS (multi-media message – *i.e.*, pictures, group texts) rate: \$0.25/message
Mobile Web² rate: \$ 0.99/day
One time activation charge: \$35.00
- Rate Plan: Prepaid Basic Device \$45 Monthly Plan
Available to: Basic devices only
Prepaid monthly access charge: \$45.00 (paid *each month* any service may be used regardless of actual usage)
Voice/Toll rate: unlimited
SMS rate: unlimited
MMS rate: unlimited
Data allowance: 500 MB
Additional data lasting different periods can be purchased: \$5 for 500 MB expiring in 30 days; \$10 for 1 GB expiring in 90 days; and \$20 for 3 GB expiring in 180 days
One time activation charge: \$35.00
- Rate Plan: Prepaid Smartphone \$45 Monthly Plan
Available to: Smartphones only

² This is a limited Internet access service for basic phones.

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Prepaid monthly access charge: \$45.00 (paid *each month* any service may be used regardless of actual usage)

Voice/Toll rate: unlimited

SMS rate: unlimited

MMS rate: unlimited

Data allowance: 1 GB

Additional data lasting different periods can be purchased: \$5 for 500 MB expiring in 30 days; \$10 for 1 GB expiring in 90 days and \$20 for 3 GB expiring in 180 days³

One time activation charge: \$35.00

- Rate Plan: Postpaid More Everything⁴ Smart Phone Entry Tier
Available to: Smartphones only
Postpaid monthly account access charge: \$20.00 (paid *each month* any service may be used regardless of actual usage)
Monthly line access charge: \$25 per line
Voice/Toll rate: unlimited
SMS rate: unlimited
MMS rate: unlimited
Data allowance: 500 MB
Data overage rate: \$15.00/250 MB
One time activation charge: \$35.00 per device

- B. SMS. One way to analyze the “lowest” SMS rate is to identify those service plans that include unlimited SMS. The rate plans with the lowest access charges for unlimited SMS, which all require meeting the terms and conditions for the plans and paying all access charges, are the Prepaid Basic Device \$45 Monthly Plan, Prepaid Smartphone \$45 Monthly Plan, and Postpaid More Everything Smart Phone Entry Tier plans described above.
- C. Data. Except for price plans that are available only to tablets, connected devices and data-only devices, data is sold in a bundle with other services, such as voice and messaging. All price plans that include data have daily or monthly access charges (which may or may not include a set amount of data), an activation charge, and overage fees. The access charge and activation charge must be paid regardless of usage.

³ A monthly access charge must be paid for each month in which a data allotment lasting beyond the first month is used.

⁴ More Everything plans allow up to 10 lines to share service allowances in a particular plan. Access requires an account level access charge plus a charge for each line on the account, including the first line.

Unlike voice/toll, and SMS, Verizon no longer offers an unlimited data plan to new customers. In this response, Verizon is providing information about the Rate Plans with the lowest monthly access data charges (assuming none of the allowances are exceeded) for bundles available to different customer types where the bundle includes a full internet data experience.⁵

- Rate Plan: Prepaid Smartphone \$45 Monthly Plan
Available to: Smartphones only
Prepaid monthly access charge: \$45.00 (paid *each month* any service may be used regardless of actual usage)
Voice/Toll rate: unlimited
SMS rate: unlimited
MMS rate: unlimited
Data allowance: 1 GB
Additional data lasting different periods can be purchased: \$5 for 500 MB expiring in 30 days; \$10 for 1 GB expiring in 90 days and \$20 for 3 GB expiring in 180 days
One time activation charge: \$35.00
- Rate Plan: Prepaid Tablet and Connected Device⁶ Daily Data Only Plan
Available to: Tablets and connected devices only
Prepaid daily access charge: \$5.00 (paid *each day* any service is used regardless of actual usage)
Voice/Toll rate: N/A
SMS rate: N/A
MMS rate: N/A
Data allowance: 300 MB per day
Data overage rate: plan must be re-purchased for \$5, even if day has not expired
One time activation charge: \$35.00
- Rate Plan Description: Prepaid Connected Device Monthly Data Only Plan
Available to: Connected devices only
Prepaid monthly access charge: \$10.00 (paid *each month* any service may be used regardless of actual usage)
Voice/Toll rate: N/A
SMS rate: N/A
MMS rate: N/A

⁵ Verizon has not included pricing for basic phone data plans under which the internet experience will be the limited Mobile Web experience described in footnote 1.

⁶ Examples of connected devices are pet trackers, health trackers and vehicle diagnostics devices.

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Data allowance: 250 MB

Data overage rate: plan must be re-purchased for \$10, even if month has not expired

One time activation charge: \$35.00

- Rate Plan: Prepaid Tablet and Connected Device Monthly Data Only Plan

Available to: Tablet and connected devices only

Prepaid monthly access charge: \$20.00 (paid *each month* any service may be used regardless of actual usage)

Voice/Toll rate: N/A

SMS rate: N/A

MMS rate: N/A

Data allowance: 1 GB

Data overage rate: plan must be re-purchased for \$20, even if month has not expired

One time activation charge: \$35.00

- Rate Plan: Postpaid More Everything Basic Device Plan Monthly Plan

Postpaid monthly account access charge: \$5.00 (paid *each month* any service may be used regardless of actual usage)

Monthly line access charge for each line: \$20 per line

Voice/Toll allowance: 700 MOU

Voice/Toll overage rate: \$0.45/MOU

SMS rate: unlimited

MMS rate: unlimited

Data allowance: N/A

Data overage rate: \$1.99/MB

One time activation charge: \$35.00 per device

- Rate Plan: Postpaid More Everything Smart Phone Entry Tier

Postpaid monthly account level access charge: \$20.00 (paid *each month* any service may be used regardless of actual usage)

Monthly line access charge for each line: \$25 per line

Voice/Toll rate: unlimited

SMS rate: unlimited

MMS rate: unlimited

Data allowance: 500 MB

Data overage rate: \$15.00/250 MB

One time activation charge: \$35.00 per device

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- Rate Plan: Postpaid More Everything Tablets and Connected Devices Data Only Plan
Available to: Tablets and connected devices only
Postpaid monthly account level access charge: \$20.00 (paid *each month* any service may be used regardless of actual usage)
Monthly line access charge per tablet/connected device: \$10.00/tablet, \$5.00/connected device
Voice/Toll rate: N/A
SMS rate: N/A
MMS rate: N/A
Data allowance: 2 GB
Data overage rate: \$15.00/1 GB
One time activation charge: \$35.00 per device
- Rate Plan: Postpaid More Everything Data Only Plan
Available to: Mobile Broadband devices such as mobile hotspots, jetpacks, and USBs; tablets; and connected devices only
Postpaid monthly account access charge: \$30.00 (paid *each month* any service may be used regardless of actual usage)
Plus monthly line access charge: \$20/Mobile Broadband device, \$10.00/tablet, \$5.00/connected device
Voice/Toll rate: N/A
SMS rate: N/A
MMS rate: N/A
Data allowance: 4 GB
Data overage rate: \$15.00/1 GB
One time activation charge: \$35.00 per device

Exhibit A

[illegible]

CDMA Carriers With LTE																			Total Voice Volumes 1Q 2015				NET PAYER OR NET RECEIVER (based on Total \$) Excl LRA \$	
CARRIER #	LRA	VZW 3G Revenue Rates (Inbound on VZW)					VZW 4G Revenue Rates (Inbound on VZW)					VZW 3G COST RATES (Outbound on Roam Carrier)					VZW 4G Cost Rates (Outbound on Roam Carrier)				VZW Inbound			VZW Outbound
		Voice Air	Dom Toll	IX DATA	EVDO DATA	SMS	VOLTE AIR per MOU	VOLTE Toll Per Mou	LTE DATA per MB	SMS - per MO	Voice Air	Dom Toll	IX DATA	EVDO DATA	SMS	VOLTE AIR per MOU	VOLTE Toll Per Mou	LTE DATA per MB	SMS - per MO	Voice Air MOU	Voice Air MOU			
1																								
2																								

		VZW Revenue Rates (Inbound on VZW)					VZW 3G COST RATES (Outbound on Roam Carrier)					VZW Inbound	VZW Outbound	
CARRIER #	LRA	Voice Air per MOU	Dom Toll - Per MOU	DATA per MB	SMS - per MO	SMS- per MT	Voice Air per MOU	Dom Toll - Per MOU	DATA per MB	SMS - per MO	SMS- per MT	Voice Air MOU	Voice Air MOU	NET PAYER OR NET RECEIVER (based on Total \$)

Carrier #40 - CDMA Only- RATE ATTACHMENT

Rates – Voice -

Serving Carrier	Air Rate / Minute	Domestic Toll Rate / Minute
[REDACTED]		

[REDACTED]		
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[REDACTED]		
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Rates – Data -

Serving Carrier	Rate per KB
[REDACTED]	

[REDACTED]	
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Carrier #52 - CDMA Only- Voice Rate Attachment

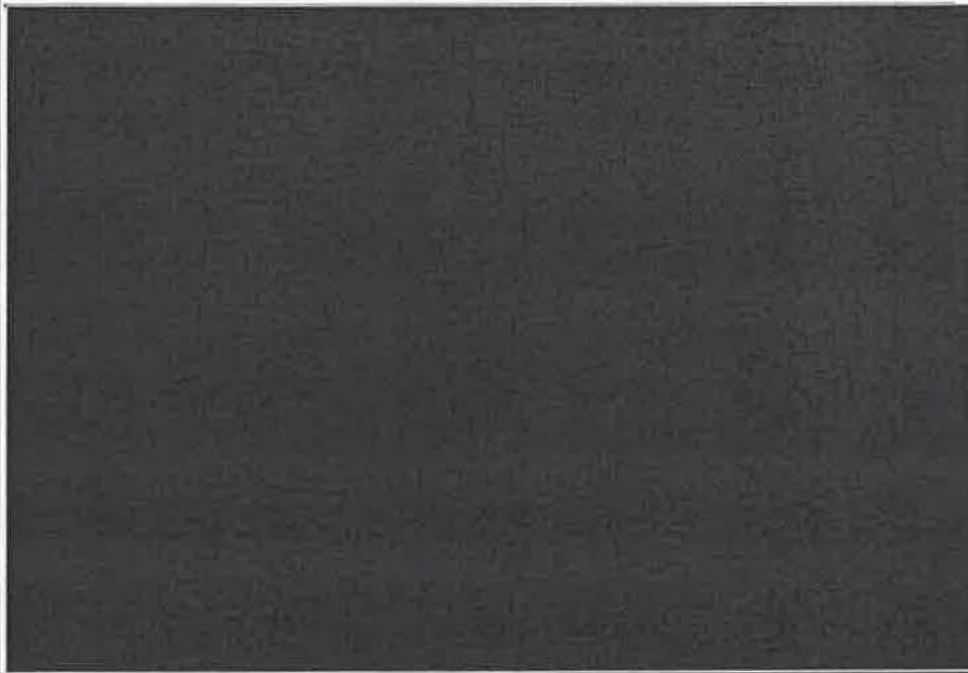
<u>Verizon Wireless Serving Carrier</u>	Airtime Rate/Min	Domestic Toll Rate/Min
[REDACTED]		

<u>Carrier #52 Serving Carrier</u>	Airtime Rate/Min	Toll Rate/Min
[REDACTED]		

Carrier #53 - CDMA Only - Rate Attachment

VZW Serving Carrier #53			Carrier #53 Serving VZW		
VOICE			VOICE		
All Markets Combined			All Markets Combined		
Monthly MOUs (M)	Air	Toll	Monthly MOUs (M)	Air	Toll

VZW Serving Carrier #53		Carrier #53 Serving VZW	
Data		Data	
Rounded MB Structure ⁽¹⁾		Rounded MB Structure ⁽⁴⁾	
Monthly MBs (M)	1X & EVDO	Monthly MBs (M)	1X & EVDO
Unrounded MB Rate Structure ⁽²⁾		Unrounded MB Rate Structure ⁽⁵⁾	
Monthly MBs (M)	1X & EVDO	Monthly MBs (M)	1X & EVDO
		ALL	



Data Rates (1)(2)	
Monthly Volume Range (in 000's)	Cost Per MB

Carrier #2 - CDMA wLTE - Data Rate Attachment

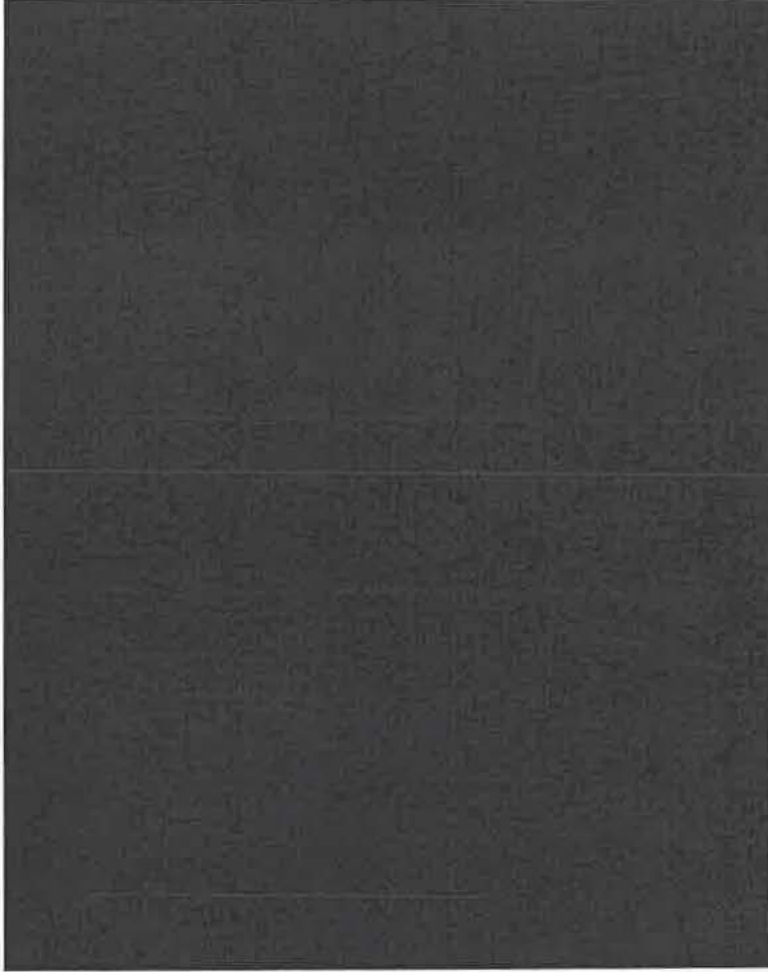
[REDACTED]

Data Rate summary:

Serving Carrier	LTE Data rate per MB
[REDACTED]	

Exhibit B

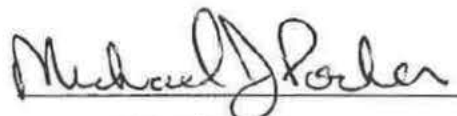
LRA Rates



DECLARATION OF MICHAEL J. POCHER

1. My name is Michael J. Pocher, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless' roaming agreements.
2. The purpose of my declaration is to certify portions of Verizon's response to NTCH's Interrogatories in NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the information provided in Response 1.
3. I have reviewed the information provided in Verizon's response to NTCH's Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: 4/27, 2015

A handwritten signature in black ink, appearing to read "Michael J. Pocher", written over a horizontal line.

Michael J. Pocher

DECLARATION OF PHILIP E. JUNKER

1. My name is Philip E. Junker, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless' LTE in Rural America program and contracts.
2. The purpose of my declaration is to certify portions of Verizon's response to NTCH's Interrogatories in NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the information provided in Response 2.
3. I have reviewed the information provided in Verizon's response to NTCH's Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: April 27, 2015



Philip Junker

DECLARATION OF DONALD H. MANLEY

1. My name is Donald H. Manley, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless' wholesale and MVNO agreements.
2. The purpose of my declaration is to certify portions of Verizon's response to NTCH's Interrogatories in NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the information provided in Response 3.
3. I have reviewed the information provided in Verizon's response to NTCH's Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: April 27, 2015

A handwritten signature in black ink, appearing to read "Donald H. Manley", written over a horizontal line.

Donald H. Manley

DECLARATION OF JOSEPH M. GRIFFIN

1. My name is Joseph M. Griffin, and I work for Verizon. In my current position, my responsibilities include developing and maintaining Verizon Wireless' consumer retail rate plans.
2. The purpose of my declaration is to certify portions of Verizon's response to NTCH's Interrogatories in NTCH, Inc. v. Celco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the information provided in Response 4.
3. I have reviewed the information provided in Verizon's response to NTCH's Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: 4/27, 2015


Joseph M. Griffin

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2015, copies of the foregoing letter and all exhibits and attachments thereto were delivered via email to the following individuals:

Donald J. Evans
Jonathan R. Markman
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street,
Suite 1100
Arlington, VA 22209



Sarah E. Trosch